

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

**BILL OF INFORMATION FOR WIRE FRAUD AND
CONSPIRACY TO COMMIT THEFT OF GOVERNMENT FUNDS**

UNITED STATES OF AMERICA	*		CRIMINAL NO.
v.	*		SECTION:
GLEND A HALL	*		VIOLATION: 18 U.S.C. § 371
aka G. Marie Hall			18 U.S.C. § 2
aka Glenda M. Hall	*		18 U.S.C. § 641
			18 U.S.C. § 1343
*	*		*

The United States Attorney charges that:

COUNT 1

CONSPIRACY TO COMMIT THEFT OF GOVERNMENT FUNDS

A. AT ALL TIMES MATERIAL HEREIN:

1. Beginning at a time unknown, but prior to September 2000, and continuing until on or about October 2004, the defendant, **GLEND A HALL**, resided at 8428 Nelson Street, New Orleans, Louisiana, 70118, in the Eastern District of Louisiana. The phone number for this residence

was (504) 866-6445, which was registered to M. J., the defendant's mother, who died on August 15, 1997.

2. The address of 1201 St. Charles Avenue, New Orleans, Louisiana 70130, was a former commercial mailbox business, Mailbox Etc., which was controlled and accessed by the defendant.

3. The address of 3628 S. Carrollton Avenue, Box #115, New Orleans, Louisiana, 70118, was a commercial mail receiving agency named Reliable Mail and Copy Center. The defendant controlled and had access to this mail drop location.

4. The address of 6221 South Claiborne Avenue, Box #473 and Box #483, New Orleans, Louisiana, 70125, was a United Parcel Service ("UPS") commercial mailbox business. The defendant controlled and had access to this mail drop location. On or about February 25, 2004, the defendant's daughter paid UPS Mailbox for the continued rental of mail drops #473 and #483.

5. On August 16, 2004, A.J.N, who was receiving OPM annuity benefits, died. Defendant **GLEND A HALL** was never authorized to receive OPM payments on behalf of A.J.N.

6. The Railroad Retirement Act, as amended (45 U.S.C. § 231a, et. seq.), provided retirement annuities for qualified employees insured under the Act. These benefit programs were administered by the United States Railroad Retirement Board ("RRB"), an agency and department of the United States.

7. The Office of Personnel Management's ("OPM") federal retirement program, established by Title 5 of the United States Code, was comprised of the Civil Service Retirement System (CSRS) and the Federal Employees' Retirement System (FERS). These federal programs were administered by OPM's Center for Retirement and Insurance Service (CRIS) in Washington,

D.C. OPM was an agency and department of the United States. CRIS was the agency program office whose primary responsibility was to determine entitlement and distribution of Federal Civil Service Retirement System or Federal Employees Retirement System retirement funds, hereafter referred to as “retirement funds”. The retirees routinely made changes regarding the deposit of their lawful retirement funds by providing a request in writing or contacting OPM via telephone. Annuity benefits terminated when the annuitant died. Any additional annuity benefits to survivors were only payable upon a new application and determination of entitlement by OPM.

8. The Department of Veterans Affairs (“VA”) was an agency and department of the United States administering benefit payments to veterans. The VA issued payments to veterans who had service-connected disabilities which were caused by disease or injury incurred or aggravated during active duty military service. The VA also issued pension benefits to non service-connected disabled wartime veterans, as well as survivors of wartime veterans who were experiencing financial hardship.

9. In 1991, the United States Secretary of Defense created the Defense Finance and Accounting Service (“DFAS”) to reduce the cost of Defense Department finance and accounting operations and to strengthen financial management through consolidation of finance and accounting activities across the department. DFAS was an agency and department of the United States. DFAS was charged with overseeing payments to military service members, including payments to retired service members.

B. THE CONSPIRACY:

10. Beginning at a time unknown but prior to September 2000, and continuing through in or about October 2004, in the Eastern District of Louisiana and elsewhere, the defendant,

GLEND A HALL, and others known and unknown to the United States Attorney, did knowingly, and willfully combine, conspire and agree to steal, purloin, and convert to their own use money and funds of the United States: to wit, the United States Railroad Retirement Board (“RRB”), the United States Veterans Administration (“VA”), the United States Department of Defense Finance and Accounting Service (“DFAS”), and the United States Office of Personnel Management (“OPM”), which were departments and agencies of the United States, to which they were not entitled, having a value of approximately \$301,687.62; in violation of Title 18, United States Code, Section 641.

C. THE OBJECT OF THE CONSPIRACY:

11. Beginning at a time unknown, but prior to September 2000, and continuing until on or about October 2004, the defendant, **GLEND A HALL** and others falsely and fraudulently diverted government retirement funds by stealing the identities of deceased federal retirees. After obtaining control of the retirement accounts, the defendant and others diverted the funds from the deceased retirees’ accounts to bank accounts and addresses controlled and/or accessed by **GLEND A HALL** and others from within the Eastern District of Louisiana (“EDLA”). The false and fraudulently diverted retirement funds were obtained by use of wire transfers, the United States mails and commercial interstate carriers.

D. OVERT ACTS:

On or about the following dates, in furtherance of the conspiracy and to accomplish its purposes and objects, the defendant, **GLEND A HALL**, and others committed the following overt acts, among others, in the Eastern District of Louisiana and elsewhere:

12. On or about January 1, 2001, E.P., who was receiving OPM benefits, died. After E.P.’s death, on February 22, 2001, the defendant, **GLEND A HALL**, fraudulently changed E.P.’s

mailing address to 1201 St. Charles Avenue, New Orleans, Louisiana, 70130, and E.P.'s electronic direct deposit to Liberty Bank and Trust Company, account number XX7298. Defendant **GLEND A HALL** controlled this bank account. On March 3, 2001, OPM electronically deposited \$2,360.33 for E.P. directly into this account. Defendant **GLEND A HALL** was never authorized to receive OPM payments on behalf of E.P.

13. On or about August 9, 2001, J.G., who was receiving VA pension benefits, died. After J.G.'s death, **GLEND A HALL** fraudulently changed J.G.'s address to 6221 S. Claiborne Avenue, New Orleans, Louisiana. Between March 27, 2002 and June 13, 2003, VA payments in the form of United States Treasury checks totaling \$2,521.06 for J.G., were sent to this address. **GLEND A HALL** was never authorized to receive VA payments on behalf of J.G.

14. On or about September 21, 2001, R. E. C., who was receiving OPM annuity benefits, died. After R.E.C.'s death, on October 4, 2001, defendant, **GLEND A HALL**, fraudulently changed R.E.C.'s payment address to Bank One, account number XX9335. **GLEND A HALL** was the holder on this bank account. After R.E.C.'s death, on October 11, 2001, OPM electronically deposited \$4,336.75 for R.E.C. into this account. **GLEND A HALL** was never authorized to receive OPM payments on behalf of R.E.C.

15. On or about May 22, 2003, M.K.D., who was receiving OPM annuity benefits, died. After M.K.D.'s death, on June 10, 2003, defendant, **GLEND A HALL**, using telephone number (504) 866-6445, called OPM to fraudulently change the mailing address to 1724 Cambronne Street, New Orleans, Louisiana, 70118, and the payment address to Metairie Bank and Trust, account number XX2021. Defendant **GLEND A HALL** was the holder on this bank account. On

September 2, 2003, OPM electronically deposited \$1,406.00 for M.K.D. into this account.

GLEND A HALL was never authorized to receive OPM payments on behalf of M.K.D.

16. On or about October 31, 2003, W.P.M., who was receiving DFAS retirement benefits, died. After W.P.M.'s death, on November 28, 2003, DFAS electronically deposited \$4,802.12 for W.P.M. into Bank of Louisiana, account number XXX6332. Defendant **GLEND A HALL** was the holder on this bank account. **GLEND A HALL** was never authorized to receive DFAS payments on behalf of W.P.M.

17. On May 8, 2004, F.V.L., who was receiving DFAS benefits, died. After F.V.L.'s death, in the Eastern District of Louisiana, the defendant, **GLEND A HALL** fraudulently changed F.V.L.'s mailing address to 4007 Panama Court, New Orleans, Louisiana, 70125, and the payment address to Wells Fargo Bank, account number XXX5829. Defendant **GLEND A HALL** controlled this bank account. Between June 1, 2004 and August 2, 2004, DFAS electronically deposited a total of \$3,060.30 directly into this account for F.V.L. **GLEND A HALL** was never authorized to receive DFAS payments on behalf of F.V.L.

All in violation of Title 18, United States Code, Section 371.

COUNT 2

WIRE FRAUD

A. The allegations contained in Paragraphs A, B, and C of Count 1 are hereby re-alleged and incorporated as though set forth in full herein.

THE SCHEME

On or about September 2004, in the Eastern District of Louisiana and elsewhere, the defendant, **GLEND A HALL**, knowingly and intentionally devised a scheme and artifice to defraud

the United States when on September 13, 2004, using telephone number (504) 866-6445, the defendant contacted OPM outside of the State of Louisiana and fraudulently requested A.J.N.'s direct deposit information be changed to Hibernia National Bank, account number XXX7078, which was controlled by defendant **GLEND A HALL**, and falsely and fraudulently had A.J.N.'s address changed to 8700 Monroe Court, New Orleans, Louisiana 70118, an address to which the defendant had access.

C. WIRE TRANSMISSION

On or about October 1, 2004, in the Eastern District of Louisiana and elsewhere, the defendant **GLEND A HALL**, for the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud and obtain money and property by means of false and fraudulent pretenses, representations, and promises, did knowingly and willfully cause to be transmitted in interstate commerce certain writings, signs, signals and sounds by means of a wire communication from Washington, D.C., to the Eastern District of Louisiana; specifically from the United States Treasury in Washington, D.C., to Hibernia National Bank, account number XXX7078, in the Eastern District of Louisiana; that was a wire transfer of \$3,060.00 of OPM funds for A.J.N. for which the defendant knew she was not entitled.

All in violation of Title 18, United States Code, Sections 1343 and 2.

NOTICE OF FORFEITURE

1. The allegations of Counts 1 and 2 of this Bill of Information are re-alleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 371, 641, 1343, and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

2. As a result of the offenses alleged in Counts 1 and 2, defendant, **GLEND A HALL**, shall forfeit to the United States pursuant to Title 18, United States Code, Sections 371, 641, 1343, and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461, any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Sections 371, 641, and 1343, including but not limited to:

\$20,081.47 in U.S. Currency;
Cook Essentials and Stove Top Grill;
Casual Living Box with Water Fountain;
Lillian Vernon Box with Mantle Lamp;
Hamilton Beach Toaster with Digital Readout;
Adjustable Sleep System, Wall Hugger with Frame and Remote;
Uniden Cordless Phone with Digital Answering Machine;
Classic Stereo;
Gateway 42" Plasma Television;
Simmons Beauty Rest Full Mattress;
Simmons Frame, Electronics, Remote and Box Spring;
Louis Vuitton Handbag;
Louis Vuitton Handbag;
Olympia Info Globe Caller ID;
Buxton Tote;
Crystal Chandelier;
Crystal Light Fixtures;
Showerhead Assembly;
Dual VHS;
PC Video Camera;
Integrated Binocular/Digital Camera;
Scientific Electronic Organizer;
Panasonic 27" TV/DVD/VHS;

George Foreman Cooks Essential Grill;
Fisher and Paychel Dishwasher;
George Foreman Grilling In Color;
Dymo Electric Label Maker;
Cooks Essential Blender;
Lladro Porcelain Nurse Figure;
Gilbert Young Collection Figurine;
Barbie Blushing Collectible;
Female Ceramic Figurine;
Male Ceramic Figurine;
Cordless Staple Gun, Tacker, and Flashlight Set;
Cordless Sweeper;
Visioneer One Touch Scanner;
Kitchenaid Stainless Steel Side by Side Refrigerator;
Denise Austin Dual Action Mini-Stepper;
George Foreman Grill;
George Foreman Cooks Essential;
Sumsung Microwave;
Afreey DVD Player;
Sony CD Player;
Go Video DVD/VCR Player/Recorder;
Various DVD's in Plastic Wrappers;
Akai Micro Component Stereo System;
Sharp 13" Flat Screen TV;
Audiovox TV/DVD/Phone;
Sharp LCD TV 19";
Rhino Mounts Universal Mounting Bracket for 42-60" Flat
Screen TV;
Schnadig Creme Chair with Matching Pillow;
Sony Handycam DCR-DVD;
Axis Video Shelf System;
Discovery Channel Home Florist Cutting System;
Sony Playstation 2 and Cords;
Sony DCR-TRV 820 Video Camera and Various Equipment;
Video Dual DVD/VHS with Power and AV Cords;
Schnadig Couch;
Sansui Dual DVD/VHS Video;
Sony Digital Camera CD Mavica and Various Equipment;
Eureka Whirlwind Light Vacuum;
RCA 7" Black and White Portable TV;
Accent Pillows;
Sharp ½ Pint Microwave;
13" TV/VHS Combo;
Portable CD Player with Headphones;

Panasonic Multioffice Phone/Fax;
Panasonic Phone/Fax;
RCA VCR;
Oreck Power Brush Vacuum;
42" Plasma TV;
Kenmore Elite Stainless Range;
Panasonic 15" LCD TV/DVD;
Samsung 19" TV;
Plastic Nurse Figurine;
Annie T Print;
John Chieng Print;
Ruth Russell Williams Print;
Dragon Vac 1000w;
Crystal Clear Lamps;
Gucci Purses;
Liz Claiborne Purses;
Articles of Clothing;
Sealed QVC Box Addressed to Glenda Hall;
QVC Women's Garment;
Chadwick's Women Suit;
Chadwick's Women Shirts;
Women's Winter Garment;
Shirts.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 371, 641, 1343, and 981(a)(1)(C),
made applicable through Title 28, United States Code, Section 2461.

JIM LETTEN (8517)
UNITED STATES ATTORNEY

JAN MASELLI MANN (9020)
First Assistant United States Attorney

LOAN "MIMI" NGUYEN (23612)
Assistant United States Attorney

New Orleans, Louisiana
April____, 2009